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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re:  
**JENNIFER R TRIMMER**  
Debtor

Chapter 13  
Bky. No. 24-11760

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**LAKEVIEW LOAN SERVICING LLC**

Movant

v.

**JENNIFER R TRIMMER**  
Debtor/ Respondent

And  
**SCOTT F WATERMAN, ESQUIRE**  
Trustee/Respondent

Respondent

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtor was current with the monthly mortgage payments at the time the bankruptcy was filed and there were no mortgage foreclosure proceedings.

6. Denied. Debtor avers there have been post petition mortgage payments made that have not been credited to her account. Strict proof of payment history is demanded at time of trial.
7. Denied. Legal fees and expenses are unwarranted.
8. Denied. After reasonable investigation, Debtor is without sufficient knowledge or information upon which to form a belief as to the truth of this averment and proof is demanded at trial.
9. Denied. This is a conclusion of law to which no response need be made.
10. No response required.

**WHEREFORE**, Respondent moves this Court to deny the Motion for Relief.

Dated: 11/25/24

/s/ Lynn E Feldman  
LYNN E. FELDMAN, ESQUIRE

UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DIVISION OF PENNSYLVANIA

IN RE: JENNIFER TRIMMER :  
Debtor : Case No. 24-11760-pmm  
CHAPTER 13

**CERTIFICATE OF SERVICE**

I, Lynn E. Feldman, Esquire, counsel for the above-captioned Debtor, does hereby certify that a true and correct copy of the foregoing **Answer to Motion of Lakeview Loan Servicing LLC for Relief from Automatic Stay**, has been served upon the parties on the attached list, by First Class United States Mail, postage prepaid, and/or electronically on the 26th day of November, 2024:

Office of the United States Trustee  
900 Market Street, Suite 320  
Philadelphia, PA 19107

Scott Waterman, Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Avenue  
P.O. Box 4010  
Reading, PA 19606

Jennifer Trimmer  
1211 Tatamy Road  
Easton, PA 18045

Internal Revenue Service  
Box 7346  
Philadelphia, PA 19101

C/O Lakeview Loan Servicing LLC  
Denise Carlon, Esquire  
KML Law Group, P.C.  
701 Market Street  
Suite 5000  
Philadelphia, PA 19106

Date: November 26, 2024

/s/ Lynn E. Feldman, Esquire  
Lynn E. Feldman, Esquire  
Attorney for Debtor  
PA I.D. #: 35996  
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